

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PUREWICK CORPORATION,

Plaintiff,

v.

SAGE PRODUCTS, LLC,

Defendant.

C.A. No. 22-102-MN-JLH

**DEFENDANT SAGE'S MOTION FOR TELECONFERENCE
TO RESOLVE DISCOVERY DISPUTES**

Pursuant to D.I. 84, Defendant Sage respectfully moves this Court to schedule a teleconference to address its outstanding disputes regarding the following discovery matters:

1. Sage's request that the Court order PureWick to provide, by a date certain, the third-party and PureWick documents previously ordered produced in this Court's January 6, 2023 Discovery Order (1/6/23 Tr. at 24-27; 39-40).
2. Sage's motion to compel PureWick to produce a witness to testify regarding Topic Nos. 1-6, 8, 10-12, 16, 17, 19, 21, 22, 24, 27, 29-31, and 39 in Sage's First and Second Rule 30(b)(6) Deposition Notices of PureWick, including topics already within the scope of the Court's January 6, 2023 Order.
3. Sage's motion to compel PureWick to supplement and/or certify the accuracy of its responses to Sage's interrogatories from the *PureWick I* matter that bear on the issues in this case including, e.g., Interrogatory Nos. 5, 6, 12, 15, and 16, which may be used in this matter pursuant to Paragraph 8 of the Scheduling Order. (D.I. 20 at 3.)

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confer teleconference on January 24, 2023.

Delaware Counsel:

- Plaintiff: Karen E. Keller, Shaw Keller LLP
- Defendant: Samantha G. Wilson, Young Conaway Stargatt & Taylor, LLP

Lead Counsel:

- Plaintiff: Nicola R. Felice and Jason C. Williams, Quinn Emanuel Urquhart & Sullivan, LLP
- Defendant: Ryan J. Pianetto and Christopher M. Scharff, McAndrews, Held & Malloy, Ltd.

The parties are presently available for a teleconference February 24, 27, and 28.

Dated: February 7, 2023

Of Counsel:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 7, 2023, a copy of the foregoing document was served on counsel listed below in the manner indicated:

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